

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

WILLIAM E. MAPP, III,
WARREN K. PAXTON, JR.,
CALEB J. WHITE, and
SERVERGY, INC.,

Defendants.

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Civ. Action No. 4:16-cv-00246

**UNOPPOSED MOTION TO SEAL DEFENDANT WARREN K. PAXTON, JR.'S
MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND
ANSWER TO INTERROGATORY FROM PLAINTIFF
SECURITIES AND EXCHANGE COMMISSION**

Defendant Warren K. Paxton, Jr., with the consent of the Securities and Exchange Commission ("SEC"), hereby files this motion to seal the unredacted version of his Motion to Compel Production of Documents and Answer to Interrogatory from Plaintiff Securities and Exchange Commission as well as the unredacted version of the related Declaration of Matthew T. Martens.

On December 13, 2016, the Court granted Mr. Paxton's Unopposed Motion for Leave to File Certain Documents Under Seal Pursuant to the All Writs Act (Dkt. 49). In his Motion to Compel Production of Documents and Answer to Interrogatory from Plaintiff Securities and Exchange Commission, Mr. Paxton quotes from and discusses information in the documents the Court allowed to be filed under seal, namely two audio recordings of witnesses interviews

obtained by him from the State of Texas in the criminal proceedings against him. Mr. Paxton respectfully requests that the Court seal his Motion due to the references to these audio recordings, in order to continue protecting the privacy and security interests of the witnesses.

CONCLUSION

For the foregoing reasons, Mr. Paxton requests, with the consent of the SEC, that this Court accept under seal the unredacted version of Mr. Paxton's Motion to Compel and related declaration.

Dated: December 14, 2016

Respectfully submitted,

/s/ Matthew T. Martens

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*Attorneys for Respondent Warren K. Paxton,
Jr.*

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2016, I electronically filed the foregoing with the Clerk of the Court through the CM/ECF system, which will send notices of electronic filing to all counsel of record.

/s/ Matthew T. Martens
Attorney

CERTIFICATE OF CONFERENCE

I hereby certify that on December 13, 2016, I complied with the meet and confer requirement in Local Rule CV-7(h) and determined that this motion will be unopposed.

/s/ Matthew T. Martens
Attorney